

**Reed Searle**

---

**From:** "Rand Crafts" <Rand-C@ipsc.com>  
**To:** "Blaine Ipson" <BLAINE-I@ipsc.com>  
**Sent:** Monday, May 07, 2001 10:10 AM  
**Subject:** Re: Meteorological Summary

I still have a couple of questions yet to be addressed, but I thought I'd fill you in with what I understand as yet. When I get anything else applicable I'll let you know.

On April 21, 2000, EPA proposed a rule to modify Appendix W of Part 51. Part 51 has to do with State authorized programs, SIPs, and PSD. Appendix W contains the Guideline on Air Quality Monitoring. The rulemaking proposed to require the use of AERMOD for modeling, along with CALPUFF for regional haze/Class 1 (we have to do both). AERMOD requires the use of meteorological data beyond what we already collect.

By the time IPP gets serious about Unit 3, AERMOD will be required. The observation that it was required by April 2001 was guided by internal EPA policy, and was part of a discussion both with a consultant instructor at the Seattle workshop, and the modeler at the State. Any permitting action is put in deep freeze until met data and pre-construction monitoring is performed. The reason for this is that this information is used to help determine incremental consumptions and possible contribution to NAAQS violations. Subsequently, this data will be used to determine the emission limits for Unit 3.

This mean for all practical purposes, we need to start on this now to avoid a permitting delay down the road. Twelve months of data must be compiled, then analyzed (another two months), then reviewed (another two months) before permitting actions can proceed.

Besides a possible siting change for our met station, we would require all new sensors, plus additional instruments to record net radiation, vertical wind speed, and delta T in ground level to upper level temps. Automated datalogging and communications would be needed. Cost: \$20,000.

Preconstruction monitoring is a little more iffy. First, screen modeling must be done to find an ideal site. We would also need to determine which pollutant(s) would be required to be monitored (based upon modeling determinations of incremental consumption and contribution to possible NAAQS violations). Most likely culprits would be PM10 and SO2. A turnkey ambient station could run as high as \$100,000.

*Maximum*

Spoke with the modeling guru at the State. He said that based upon the mountain of information for this area (between our postconstruction monitoring, and Brush's & Continental's monitoring), the State could likely calculate and project enough information to issue a permit to construct fairly quickly. BUT.....we would still have to do the onsite met and preconstruction ambient air monitoring to submit and back-up the basis for the permit. If the info they used differs from what we obtain, the State would either rewrite the terms of the permit with new limits, or force construction to stop.

>>> Blaine Ipson Thursday, May 03, 2001 3:46:17 PM >>>

Will you please e-mail me a summary on the new siting criteria for meterogical data and EPA's new model that took place on April 1st. I need a cook book simple summary so that we can discuss it with Dennis, Gale, Reed and who ever else we need to. I am sure we will be asked questions on it. Thanks.

5/8/01

**IP7\_039671**

**Reed Searle**

---

**From:** <bharve@dwp.ci.la.ca.us>  
**To:** "Dunbar, William" <BDunbar@rwbeck.com>  
**Cc:** <mnosan@dwp.ci.la.ca.us>; <Gale-C@ipsc.com>; <RSearle@ipautah.com>  
<RSearle@ipautah.com>

**Sent:** Wednesday, May 02, 2001 3:06 PM

**Subject:** Re: Cost Projections, Dense Pack Modifications

Toward finalizing cost projections, you posed three questions. The questions and answers follow:

Q1) What is the projected amount and timing of Unit 1 dense pack?

A1: Unit 1 dense pack projected amount is \$4.5M. That expenditure will be for turbine work and minor scrubber work. Timing is FY 2002-2003, with installation during the spring 2003 four-week outage.

Q2) What is the projected MW increase for each unit resulting from dense pack?

A2:

20 MW per unit increase from dense pack alone, at estimated total capital cost of \$10M for two units. The 20 MW increase can be achieved at current firing rates and emissions.

50 MW per unit increase from dense pack and balance of plant (chiefly, generator cooling and cooling tower capacity increases), at estimated total capital cost of \$21.4M if no new NOX control is required, \$65M if SNCR is required, \$191.4M if SCR is required. The notice of intent filed with Utah Division of Air Quality is for 50 MW. Ongoing discussions with DAQ could result in operating permit changes for 50 MW or 20 MW. If 20 MW is approved as a result of the current filing, another filing could be made in the future for 50 MW. Assuming 50 MW is approved at some time, a decision whether to undertake BOP work will be influenced by operating permit changes DAQ would require, assessment of SNCR and SCR effectiveness with western coal, and projections for changes in NOX control technology over the next six years.

Q3) Is the Unit 2 dense pack still scheduled for FY 2001-02 at a cost of \$5.5M?

A3: Yes, scheduled and budgeted.

5/3/01

IP7\_039672